



IDAHO DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton
Boise, Idaho 83706-1253

RECEIPT

8/11/08

DATE

RECEIVED FROM Freedom Plastics

SOURCE Cash <input type="checkbox"/> Check <input checked="" type="checkbox"/> Money Order <input type="checkbox"/> No. _____					
DESCRIPTION				AMOUNT OF PAYMENT	
PTC Application Fee				1000.00	
Preston ID,					
Primary SIC 3084					
RECEIVED BY <u>[Signature]</u>				TOTAL RECEIVED	
				1000.00	
PID	OBS	CA	SUB-OBJ	WP	BE

No 82878

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1.0 Introduction

On behalf of Freedom Plastics, Inc., CH2M HILL has prepared a Permit to Construct (PTC) Application for an existing facility located in Preston, Idaho. The facility is located at 640 S Highway 91 in the southeastern portion of Preston in Franklin County. This application satisfies the requirements for a PTC in accordance with the *Rules for the Control of Air Pollution in Idaho* (IDAPA) 58.01.01.200 through 228.

Freedom Plastics, Inc. was founded in 1976 in Janesville, Wisconsin as a plastic (PVC) pipe manufacturer and currently has production facilities in Wisconsin, Florida, and Preston, Idaho. Freedom Plastics, Inc. is also a fabricator of PVC fittings that are used for a variety of residential, industrial, and commercial applications. The Freedom Plastics, Inc. facility in Preston, Idaho currently contains multiple natural gas combustion sources and volatile organic compounds (VOC) emission generating sources.

Actual emission estimates were based on the largest quantities generated from 2004 through 2007. Actual VOC emission estimates were approximately 7.6 tons per year (tpy). Therefore, Freedom Plastics, Inc. is requesting a PTC to address facility-wide PVC manufacturing operations from a variety of emission generating sources at its Preston facility as listed in Table 1.

Table 1-Emission Generating Sources

VOC Emission Sources	Natural Gas Combustion Sources
P-70 Primer	Glycol Tanks
811 A-B Epoxy	Square Heaters
AA-2304 Contact Cement	Wall Heater
1969 Green Glue	Infrared Heaters
711 White and Grey Glue	Forced Air Furnaces
719 White and Grey Glue	

In order to determine compliance with VOC emissions, Freedom Plastics, Inc. is requesting permit quantity limits of 2,000 gal/yr and 1,500 gal/yr for P-70 Primer and 719 White Glue; respectively, because these two materials alone account for 90% of the actual VOC emissions.

In addition, ambient air modeling is not required because individual toxic air pollutants do not exceed the emission screening levels. This issue was discussed and mutually agreed upon in a conference call meeting held with the Idaho Department of Environmental Quality and Freedom Plastics, Inc. on April 15, 2008.

This PTC application includes: a process description, facility classification, actual and potential emission estimates, and a regulatory review.

An application fee has been included with the application submittal in accordance with IDAPA 58.01.01.226. DEQ permit application forms are provided in Appendix A.

2.0 Process Description

Freedom Plastics uses standard length PVC plastic pipe as a raw material, stockpiled outside the manufacturing building and brought into the building by forklift. Once inside, the pipe is taken to the saw and cut into required lengths. If the cut pipe piece requires a drilled hole, it is taken to the router station for drilling. The pipe piece is then taken to the pulling station where it is placed on a heated pad and heated until it achieves the correct flexibility. At this time, a heated mandrel is placed inside the pipe to be pulled through the router hole.

The piece is then placed in a glycol tank at the required depth and heated for the required time according to the pipe thickness, after which it is moved to a bellling station and placed on a mandrel to make either a hub or gasket end. When this process is finished, the pipe piece is taken to the trim-saw for any necessary trimming. If additional pieces need to be attached, the piece is taken to the gluing station where P-70 Primer, epoxy, and other glues listed in Table 1 are used to join the additional pieces. The finished fitting is then taken to the shipping area for quality assurance measurements. If the fitting requires a gasket, the gasket is glued in with contact cement prior to shipment.

Although the cutting, drilling, and trimming processes release small amount of particulates into the air, these are captured by a filtration system within the building and not vented outside.

3.0 Facility Classification

The Freedom Plastics facility is considered a minor source according to Federal and Idaho state regulations. The facility emits less than 100 tons per year of any regulated pollutant or combined volatile organic compounds. The site is a minor source for Hazardous Air Pollutants (HAP) with total potential aggregate HAP emissions of less than 25 tons per year and emissions of any single HAP of less than 10 tons per year.

Franklin County is classified as attainment or unclassifiable for the criteria pollutants NO_x , SO_2 , ozone, lead, and PM_{10} . There are no Class I areas within 10 kilometers of the facility.

4.0 Emission Estimates

Emission estimates were calculated based on emission factors derived from the United States Environmental Protection Agency (US EPA) *Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1: Stationary Point and Area Sources*,¹ and Material Safety Data Sheets (MSDS) supplied by the facility.

Actual criteria air pollutant and toxic air pollutant estimates are presented in Table 2 and Table 3, respectively. Actual emission estimates for natural gas combustion sources are based on two shifts (day and swing). Each shift operates 40 hours per week (hr/wk). Therefore, the total annual hours of operation for the facility is approximately 4,160 hours per year. Actual emissions for chemical materials are based on largest usage quantities supplied by Freedom Plastics, Inc. for calendar years 2004 through 2007. Actual emission spreadsheets are included in Appendix B.

Table 2 - Actual Criteria Air Pollutant Emission Estimates

Point / Non-point Sources	Estimated Criteria Air Pollutants Emission Rate (ton/year)					
	PM	PM-10	NOx	SO2	CO	VOC
Glycol Tanks	0.03	0.03	0.38	0.00	0.32	0.02
Square Heaters	1.9E-03	1.9E-03	2.4E-02	1.5E-04	2.1E-02	1.3E-03
Wall Heater	4.6E-04	4.6E-04	6.1E-03	3.7E-05	5.1E-03	3.4E-04
Infrared Heaters	0.02	0.02	0.24	1.5E-03	0.21	0.01
Forced Air Furnaces	0.03	0.03	0.34	2.1E-03	0.29	0.02
Total Chemical Use	---	---	---	---	---	7.56
Total Point Sources	0.1	0.1	1.0	0.0	0.8	7.6
Significant Emission Rates (10%)	2.5	1.5	4.0	4.0	10.0	4.0
Exceeds Significant Threshold?	No	No	No	No	No	Exceeds

¹ Obtained from EPA website June 2008.

Table 3 - Actual Toxic Air Pollutant Emission Estimates

Toxic Air Pollutants ³	CAS No.	Estimated Uncontrolled Air Toxic Pollutants Emission Rate (lb/hr)						Toxic Emission Totals (lb/hr)	IDAPA 58.01.01.585/586 - EL (lb/hr)	PTE Emission Rate vs. EL
		Glycol Tanks	Square Heaters	Wall Heater	Infrared Heaters	Forced-Air Furnaces	Total Chemical Use			
3-Methylchloranthrene	56-49-5	3.26E-09	2.12E-10	5.29E-11	2.12E-09	2.97E-09	---	8.62E-09	2.50E-06	Below
Acetone	67-64-1	---	---	---	---	---	2.10E-01	2.10E-01	1.19E+02	Below
Benzene	71-43-2	3.81E-06	2.47E-07	6.18E-08	2.47E-06	3.47E-06	---	1.01E-05	8.00E-04	Below
Benzo(a)pyrene*	50-32-8	2.18E-09	1.41E-10	3.53E-11	1.41E-09	1.98E-09	---	5.75E-09	2.00E-06	Below
Benzoyl peroxide	91-36-0	---	---	---	---	---	1.21E-02	1.21E-02	3.33E-01	Below
Cyclohexanone	108-94-1	---	---	---	---	---	3.22E-01	3.22E-01	6.67E+00	Below
Formaldehyde	50-00-0	1.36E-04	8.82E-06	2.21E-06	8.82E-05	1.24E-04	---	3.59E-04	5.10E-04	Below
Hexane	110-54-3	3.26E-03	2.12E-04	5.29E-05	2.12E-03	2.97E-03	1.68E-08	8.62E-03	1.20E+01	Below
Methyl ethyl ketone	78-93-3	---	---	---	---	---	4.88E-01	4.88E-01	3.93E+01	Below
Methyl methacrylate	80-62-6	---	---	---	---	---	9.04E-02	9.04E-02	2.73E+01	Below
Naphthalene	91-20-3	1.11E-06	7.18E-08	1.79E-08	7.18E-07	1.01E-06	---	2.92E-06	3.33E+00	Below
Pentane	109-66-0	4.72E-03	3.06E-04	7.65E-05	3.06E-03	4.30E-03	---	1.25E-02	1.18E+02	Below
Toluene	108-88-3	6.17E-06	4.00E-07	1.00E-07	4.00E-06	5.62E-06	3.59E-08	1.63E-05	2.50E+01	Below
Tetrahydrofuran	109-99-9	---	---	---	---	---	1.39E+00	1.39E+00	3.93E+01	Below
POM ⁴		2.07E-08	1.34E-09	3.35E-10	1.34E-08	1.88E-08	---	5.46E-08	2.00E-06	Below
Toxic Air Pollutants-Metals ⁵										
Arsenic	7440-38-2	3.63E-07	2.35E-08	5.29E-11	2.12E-09	2.97E-09	---	3.91E-07	1.50E-06	Below
Barium	7440-39-3	7.98E-06	5.18E-07	6.18E-08	2.47E-06	3.47E-06	---	1.45E-05	3.30E-02	Below
Beryllium	7440-41-7	2.18E-08	1.41E-09	3.53E-11	1.41E-09	1.98E-09	---	2.66E-08	2.80E-05	Below
Cadmium	7440-43-9	2.00E-06	1.29E-07	2.21E-06	8.82E-05	1.24E-04	---	2.16E-04	3.70E-06	Below
Chromium	7440-47-3	2.54E-06	1.65E-07	5.29E-05	2.12E-03	2.97E-03	---	5.15E-03	3.30E-02	Below
Cobalt	7440-48-4	1.52E-07	9.88E-09	1.79E-08	7.18E-07	1.01E-06	---	1.91E-06	3.30E-03	Below
Copper	7440-50-8	1.54E-06	1.00E-07	7.65E-05	3.06E-03	4.30E-03	---	7.43E-03	1.30E-02	Below
Manganese	7439-96-5	6.89E-07	4.47E-08	1.00E-07	4.00E-06	5.62E-06	---	1.05E-05	6.70E-02	Below
Mercury	7439-97-6	4.72E-07	3.06E-08	7.06E-10	2.82E-08	3.96E-08	---	5.71E-07	1.00E-03	Below
Molybdenum	7439-98-7	2.00E-06	1.29E-07	4.71E-10	1.88E-08	2.64E-08	---	2.17E-06	3.33E-01	Below
Nickel	7440-02-0	3.81E-06	2.47E-07	5.29E-11	2.12E-09	2.97E-09	---	4.06E-06	2.75E-05	Below
Selenium	7782-49-2	4.35E-08	2.82E-09	5.29E-11	2.12E-09	2.97E-09	---	5.15E-08	1.30E-02	Below
Vanadium	1314-62-1	4.17E-06	2.71E-07	7.06E-11	2.82E-09	3.96E-09	---	4.45E-06	3.00E-03	Below
Zinc	7440-66-6	5.26E-05	3.41E-06	5.29E-11	2.12E-09	2.97E-09	---	5.60E-05	3.33E-01	Below

Notes:

¹ Criteria Pollutants, small uncontrolled boilers (EPA AP-42, Section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2).

² PM emission factor is assumed to equal PM₁₀.

³ Toxic Air Pollutants (EPA AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-3).

⁴ Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene,

benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. Designated by *

⁵ Metals from Natural Gas Combustion (EPA AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-4).

Potential to emit (PTE) criteria air pollutant and toxic air pollutant estimates are presented in Table 4 and Table 5, respectively. PTE estimates for natural gas combustion sources are based on 8,760 hours per year. PTE estimates for chemical materials are based on doubling the largest usage quantities supplied by Freedom Plastics, Inc. for calendar years 2004 through 2007. PTE estimates were adjusted higher for P-70 Primer and 719 White Glue in order to establish VOC emissions below 10 tons per year.

Additionally, in order to determine compliance with VOC emissions, Freedom Plastics, Inc. is requesting permit quantity limits of 2,000 gal/yr and 1,500 gal/yr for P-70 Primer and 719 White Glue; respectively, because these two materials alone account for 90% of the VOC emissions. PTE emission spreadsheets are included in Appendix C.

Table 4 - Potential to Emit Criteria Air Pollutant Emission Estimates

Point / Non-point Sources	Estimated Criteria Air Pollutants Emission Rate (ton/year)					
	PM	PM-10	NOx	SO2	CO	VOC
Glycol Tanks	0.06	0.06	0.79	0.00	0.67	0.04
Square Heaters	3.9E-03	3.9E-03	0.05	3.1E-04	0.04	2.8E-03
Wall Heater	9.8E-04	9.8E-04	1.3E-02	7.7E-05	1.1E-02	7.1E-04
Infrared Heaters	0.04	0.04	0.52	3.1E-03	0.43	0.03
Forced Air Furnaces	0.05	0.05	0.72	4.3E-03	0.61	0.04
Total Chemical Use	---	---	---	---	---	9.41
Total Point Sources	0.2	0.2	2.1	0.0	1.8	9.5
Significant Emission Rates (10%)	2.5	1.5	4.0	4.0	10.0	4.0
Exceeds Significant Threshold?	No	No	No	No	No	Exceeds

Table 5 - Potential to Emit Toxic Air Pollutant Emission Estimates

Toxic Air Pollutants ³		Estimated Uncontrolled Air Toxic Pollutants Emission Rate (lb/hr)						Toxic Emission Totals (lb/hr)	IDAPA 58.01.01.585/586 - EL (lb/hr)	PTE Emission Rate vs. EL
		Glycol Tanks	Square Heaters	Wall Heater	Infrared Heaters	Forced-Air Furnaces	Total Chemical Use			
3-Methylchloranthrene	56-49-5	3.26E-09	2.12E-10	5.29E-11	2.12E-09	2.97E-09	---	8.62E-09	2.50E-06	Below
Acetone	67-64-1	---	---	---	---	---	4.19E-01	4.19E-01	1.19E+02	Below
Benzene	71-43-2	3.81E-06	2.47E-07	6.18E-08	2.47E-06	3.47E-06	---	1.01E-05	8.00E-04	Below
Benzo(a)pyrene*	50-32-8	2.18E-09	1.41E-10	3.53E-11	1.41E-09	1.98E-09	---	5.75E-09	2.00E-06	Below
Benzoyl peroxide	91-36-0	---	---	---	---	---	1.21E-02	1.21E-02	3.33E-01	Below
Cyclohexanone	108-94-1	---	---	---	---	---	5.56E-01	5.56E-01	6.67E+00	Below
Formaldehyde	50-00-0	1.36E-04	8.82E-06	2.21E-06	8.82E-05	1.24E-04	---	3.59E-04	5.10E-04	Below
Hexane	110-54-3	3.26E-03	2.12E-04	5.29E-05	2.12E-03	2.97E-03	1.68E-08	8.62E-03	1.20E+01	Below
Methyl ethyl ketone	78-93-3	---	---	---	---	---	8.43E-01	8.43E-01	3.93E+01	Below
Methyl methacrylate	80-62-6	---	---	---	---	---	9.04E-02	9.04E-02	2.73E+01	Below
Naphthalene	91-20-3	1.11E-06	7.18E-08	1.79E-08	7.18E-07	1.01E-06	---	2.92E-06	3.33E+00	Below
Pentane	109-66-0	4.72E-03	3.06E-04	7.65E-05	3.06E-03	4.30E-03	---	1.25E-02	1.18E+02	Below
Toluene	108-88-3	6.17E-06	4.00E-07	1.00E-07	4.00E-06	5.62E-06	3.59E-08	1.63E-05	2.50E+01	Below
Tetrahydrofuran	109-99-9	---	---	---	---	---	2.37E+00	2.37E+00	3.93E+01	Below
POM ⁴		2.07E-08	1.34E-09	3.35E-10	1.34E-08	1.88E-08	---	5.46E-08	2.00E-06	Below
Toxic Air Pollutants-Metals ⁵										
Arsenic	7440-38-2	3.63E-07	2.35E-08	5.29E-11	2.12E-09	2.97E-09	---	3.91E-07	1.50E-06	Below
Barium	7440-39-3	7.98E-06	5.18E-07	6.18E-08	2.47E-06	3.47E-06	---	1.45E-05	3.30E-02	Below
Beryllium	7440-41-7	2.18E-08	1.41E-09	3.53E-11	1.41E-09	1.98E-09	---	2.66E-08	2.80E-05	Below
Cadmium	7440-43-9	2.00E-06	1.29E-07	2.21E-06	8.82E-05	1.24E-04	---	2.16E-04	3.70E-06	Below
Chromium	7440-47-3	2.54E-06	1.65E-07	5.29E-05	2.12E-03	2.97E-03	---	5.15E-03	3.30E-02	Below
Cobalt	7440-48-4	1.52E-07	9.88E-09	1.79E-08	7.18E-07	1.01E-06	---	1.91E-06	3.30E-03	Below
Copper	7440-50-8	1.54E-06	1.00E-07	7.65E-05	3.06E-03	4.30E-03	---	7.43E-03	1.30E-02	Below
Manganese	7439-96-5	6.89E-07	4.47E-08	1.00E-07	4.00E-06	5.62E-06	---	1.05E-05	6.70E-02	Below
Mercury	7439-97-6	4.72E-07	3.06E-08	7.06E-10	2.82E-08	3.96E-08	---	5.71E-07	1.00E-03	Below
Molybdenum	7439-98-7	2.00E-06	1.29E-07	4.71E-10	1.88E-08	2.64E-08	---	2.17E-06	3.33E-01	Below
Nickel	7440-02-0	3.81E-06	2.47E-07	5.29E-11	2.12E-09	2.97E-09	---	4.06E-06	2.75E-05	Below
Selenium	7782-49-2	4.35E-08	2.82E-09	5.29E-11	2.12E-09	2.97E-09	---	5.15E-08	1.30E-02	Below
Vanadium	1314-62-1	4.17E-06	2.71E-07	7.06E-11	2.82E-09	3.96E-09	---	4.45E-06	3.00E-03	Below
Zinc	7440-66-6	5.26E-05	3.41E-06	5.29E-11	2.12E-09	2.97E-09	---	5.60E-05	3.33E-01	Below

Notes:

¹ Criteria Pollutants, small uncontrolled boilers (EPA AP-42, Section 1.4 Natural Gas Combustion, Tables 1.4-1 and 1.4-2).

² PM emission factor is assumed to equal PM₁₀.

³ Toxic Air Pollutants (EPA AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-3).

⁴ Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. Designated by *

⁵ Metals from Natural Gas Combustion (EPA AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-4).

5.0 Applicable Requirements

State and Federal Regulation Applicability

The following sections address air quality regulatory compliance requirements for the Freedom Plastics, Inc Preston facility. As detailed below, the sources comply with all applicable Idaho air quality regulations codified in IDAPA 58.01.01, as well as US EPA Code of Federal Regulations (CFR).

Federal Regulations

New Source Review (NSR) and PSD Applicability - 40 CFR Parts 51 and 52

In accordance with EPA and IDAPA 58.01.01.205 rules, the proposed facility would be required to submit a construction permit application subject to the requirements of NSR if it is determined to be a major source or a major modification. The requirements of NSR vary in two substantial ways, depending on whether the proposed facility will be located in an area that is in attainment of NAAQS.

New Source Review (NSR)

Prevention of Significant Deterioration (PSD) is the portion of NSR that applies to pollutants that are in attainment or non-attainment of NAAQS, or are unclassifiable. Franklin County is classified as attainment or unclassifiable for the criteria pollutants NO_x, SO₂, ozone, lead, and PM₁₀. Therefore, new or modified air emission sources in Franklin County are potentially subject to PSD review for these pollutants, depending on the proposed facility's major source status and on the emission rates of NO_x, SO₂, VOC, and PM₁₀.

A source is considered to be major if:

1. It is included in a list of 28 specific source categories and its potential to emit any of the NSR-regulated pollutants exceeds 100 tons per year (tpy), or
2. If its PTE exceeds 250 tpy for any other source category.

The Freedom Plastics, Inc. Preston facility is not one of the 28 listed source categories. In addition, the proposed facility is not expected to have a PTE greater than 250 tons per year for NO_x, SO₂, VOC, and PM₁₀. Therefore, the facility is not a major source and will not need to undergo an attainment NSR. (See Table 4 and Table 5 in Section 4.0 for PTE emission calculations).

New Source Performance Standards - 40 CFR Part 60

There are no New Source Performance Standards (NSPS) regulations that apply to the PVC plastic pipe operation at the Freedom Plastics Preston facility.

National Emission Standards for Hazardous Air Pollutants - 40 CFR Part 63

Section 112 of the Clean Air Act (CAA) Amendments relates to the release of air toxic contaminants. The requirements of CAA Section 112(g) or (j) are not applicable because the facility is not a major source of hazardous air pollutants (HAP) (40 CFR 63.40(b)). Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAPS) applies to major sources of HAP, defined as the facility's PTE greater than 10 ton per year for any single HAP or the PTE greater than 25 ton per year for total HAP. HAP emissions from the Preston facility are expected to be below these threshold amounts.

Title V Operating Permit Program- 40 CFR Part 70

The CAA requires states to develop an operating permit program (40 CFR Part 70) for major sources. As described above, the Preston facility is not a major source.

Accidental Release Prevention Program- 40 CFR Part 68

The Preston facility is not expected to use any chemicals that will make the facility subject to the Accidental Release Prevention Program.

Compliance Assurance Monitoring (CAM) - 40 CFR Part 64

The Preston facility is not expected to be subject to the CAM rule.

IDAPA Regulations

IDAPA 58.01.01.123

CERTIFICATION OF DOCUMENTS

"All documents, including but not limited to, application forms for permits to construct, application forms for operating permits, progress reports, records, monitoring data, supporting information, requests for confidential treatment, testing reports or compliance certifications submitted to the Department shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

IDAPA 58.01.01.124

TRUTH, ACCURACY AND COMPLETENESS OF DOCUMENTS.

"All documents submitted to the Department shall be truthful, accurate and complete."

IDAPA 58.01.01.125

FALSE STATEMENTS

"No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit, or any applicable rule or order in force pursuant thereto."

IDAPA 58.01.01.130

STARTUP, SHUTDOWN, SCHEDULED MAINTENANCE, SAFETY MEASURES, UPSET AND BREAKDOWN.

If an excess emission event occurs during startup, shutdown, scheduled maintenance, safety measures, upset or breakdown, the Preston facility will comply with IDAPA 58.01.01.130 through 58.01.01.136.

In the event of an upset or breakdown, the malfunctioning unit would be immediately shut down. This includes any malfunction that could create excess emissions.

IDAPA 58.01.01.156

TOTAL COMPLIANCE

"Where more than one (1) section of these rules applies to a particular situation, all such rules must be met for total compliance, unless otherwise provided for in these rules."

IDAPA 58.01.01.161

TOXIC SUBSTANCES

1. Glycol Tanks
2. Square Heaters
3. Wall Heater
4. Infrared Heaters
5. Forced Air Furnaces
6. P-70 Primer
7. 811 A-B Epoxy
8. AA-2304 Contact Cement
9. 1969 Green Glue
10. 711 White Glue
11. 711 Grey Glue
12. 719 White Glue
13. 719 Grey Glue

"Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation."

See Table 4 and Table 5 in Section 4.0 for the PTE emission estimates.

IDAPA 58.01.01.210

DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARDS

1. Glycol Tanks
2. Square Heaters
3. Wall Heater
4. Infrared Heaters
5. Forced Air Furnaces
6. P-70 Primer

7. 811 A-B Epoxy
8. AA-2304 Contact Cement
9. 1969 Green Glue
10. 711 White Glue
11. 711 Grey Glue
12. 719 White Glue
13. 719 Grey Glue

"In accordance with Subsection 203.03, the applicant shall demonstrate preconstruction compliance with Section 161 to the satisfaction of the Department. The accuracy, completeness, execution and results of the demonstration are all subject to review and approval by the Department."

See Table 4 and Table 5 in Section 4.0 for the PTE emission estimates.

IDAPA 58.01.01.220 General Exemption Criteria For Permit to Construct Exemptions

IDAPA 58.01.01.221 Category I Exemption

"No permit to construct is required for a source that satisfies the criteria set forth in Section 220 and the following:"

IDAPA 58.01.01.221.01 Below Regulatory Concern.

"The maximum capacity of a source to emit an air pollutant under its physical and operational design considering limitations on emissions such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed shall be less than ten percent (10%) of the significant emission rates set out in the definition of significant at Section 006."

Actual VOC emission estimates were approximately 7.6 tpy based on the largest quantities generated from 2004 through 2007.

IDAPA 58.01.01.300 PROCEDURES AND REQUIREMENTS FOR TIER I OPERATING PERMITS

"The purposes of Sections 300 through 399 are to establish requirements and procedures for the issuance of Tier I operating permits."

Not applicable. The Preston facility will be classified as a minor source facility with total potential emissions less than 100 tons per year.

IDAPA 58.01.01.590 NEW SOURCE PERFORMANCE STANDARDS

1. Glycol Tanks
2. Square Heaters
3. Wall Heater
4. Infrared Heaters
5. Forced Air Furnaces
6. P-70 Primer
7. 811 A-B Epoxy
8. AA-2304 Contact Cement

9. 1969 Green Glue
10. 711 White Glue
11. 711 Grey Glue
12. 719 White Glue
13. 719 Grey Glue

The proposed sources are not applicable under 40 CFR Part 60 – see compliance review in the federal summary.

IDAPA 58.01.01.591

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

1. Glycol Tanks
2. Square Heaters
3. Wall Heater
4. Infrared Heaters
5. Forced Air Furnaces
6. P-70 Primer
7. 811 A-B Epoxy
8. AA-2304 Contact Cement
9. 1969 Green Glue
10. 711 White Glue
11. 711 Grey Glue
12. 719 White Glue
13. 719 Grey Glue

The proposed sources are not regulated under 40 CFR Part 61 and 40 CFR Part 63, because the Preston facility is below threshold limits.

IDAPA 58.01.01.650

RULES FOR CONTROL OF FUGITIVE DUST

The Preston facility will take all reasonable precautions to prevent the generation of fugitive dust as outlined under IDAPA 58.01.01.650-651.

IDAPA 58.01.01.775

RULES FOR CONTROL OF ODORS

The Preston facility will follow the guidelines set under IDAPA 58.01.01.775 through IDAPA 58.01.01.776 to control odorous emissions from all sources for which no gaseous emission control rules apply.

IDAPA 58.01.01.776

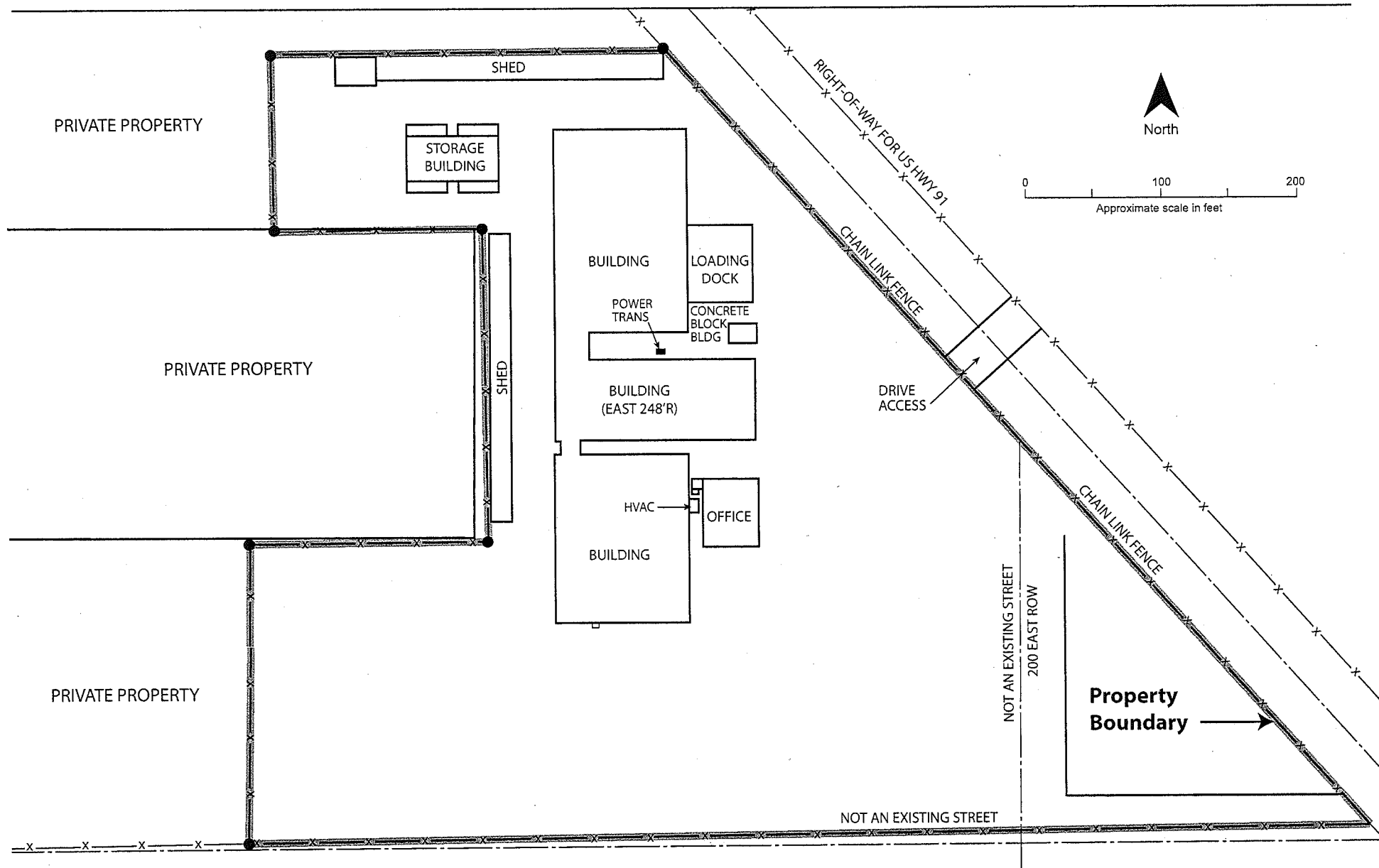
GENERAL RULES

IDAPA 58.01.01.776.01

General Restrictions

"No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids into the atmosphere in such quantities as to cause air pollution."

Figure 1 – Site Plan



Property Boundary →

SITE PLAN
Freedom Plastics
640 Highway 91
Preston, Idaho

Appendix A

IDEQ Application Forms



DEQ AIR QUALITY PROGRAM
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Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

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Please see instructions on page 2 before filling out the form.

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER

1. Company Name	Freedom Plastics, Inc.	
2. Facility Name	Freedom Plastics, Preston, ID Facility	3. Facility ID No.
4. Brief Project Description - One sentence or less	PVC Fabricator	

PERMIT APPLICATION TYPE

5. <input type="checkbox"/> New Facility	<input type="checkbox"/> New Source at Existing Facility	<input checked="" type="checkbox"/> Unpermitted Existing Source
<input type="checkbox"/> Modify Existing Source: Permit No.: _____ Date Issued: _____		
<input type="checkbox"/> Required by Enforcement Action: Case No.: _____		
6. <input checked="" type="checkbox"/> Minor PTC	<input type="checkbox"/> Major PTC	

FORMS INCLUDED

Include d	N/A	Forms	DEQ Verify
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form GI – Facility Information	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU0 – Emissions Units General	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU1 - Industrial Engine Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU2 - Nonmetallic Mineral Processing Plants Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU3 - Spray Paint Booth Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU4 - Cooling Tower Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU5 – Boiler Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form HMAP – Hot Mix Asphalt Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CBP - Concrete Batch Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form BCE - Baghouses Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form SCE - Scrubbers Control Equipment	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms EI-CP1 - EI-CP4 - Emissions Inventory– criteria pollutants (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	PP – Plot Plan	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Forms MI1 – MI4 – Modeling (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form FRA – Federal Regulation Applicability	<input type="checkbox"/>

DEQ USE ONLY

Date Received

Project Number

Payment / Fees Included?

Yes ☐ No ☐

Check Number



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Please see instructions on page 2 before filling out the form.

All information is required. If information is missing, the application will not be processed.

IDENTIFICATION	
1. Company Name	Freedom Plastics, Inc.
2. Facility Name (if different than #1)	
3. Facility I.D. No.	
4. Brief Project Description:	
FACILITY INFORMATION	
5. Owned/operated by: (if applicable)	<input type="checkbox"/> Federal government <input type="checkbox"/> County government <input type="checkbox"/> State government <input type="checkbox"/> City government
6. Primary Facility Permit Contact Person/Title	Jeannie Bell, Environmental Manager
7. Telephone Number and Email Address	(208) 852-2000 jeanniebell@freedomplastics.com
8. Alternate Facility Contact Person/Title	
9. Telephone Number and Email Address	
10. Address to which permit should be sent	640 S Highway 91
11. City/State/Zip	Preston, Idaho 83263
12. Equipment Location Address (if different than #9)	
13. City/State/Zip	
14. Is the Equipment Portable?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15. SIC Code(s) and NAISC Code	Primary SIC: 3084 Secondary SIC (if any): NAICS:
16. Brief Business Description and Principal Product	PVC Fabricator
17. Identify any adjacent or contiguous facility that this company owns and/or operates	
PERMIT APPLICATION TYPE	
18. Specify Reason for Application	<input type="checkbox"/> New Facility <input type="checkbox"/> New Source at Existing Facility <input type="checkbox"/> Modify Existing Source: Permit No.: Date Issued: <input checked="" type="checkbox"/> Unpermitted Existing Source: <input type="checkbox"/> Required by Enforcement Action: Case No.:
CERTIFICATION	
IN ACCORDANCE WITH IDAPA 58.01.01.123 (RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO), I CERTIFY BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE, AND COMPLETE.	
19. Responsible Official's Name/Title	RICK HOFFMAN PLANT ENGINEER
20. RESPONSIBLE OFFICIAL SIGNATURE	
21. <input checked="" type="checkbox"/> Check here to indicate you would like to review a draft permit prior to final issuance.	Date: 7/15/08



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PERMIT TO CONSTRUCT APPLICATION

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Please see instructions on page 2 before filling out the form.

IDENTIFICATION

Company Name: Freedom Plastics, Inc	Facility Name: Preston, ID facility	Facility ID No:
Brief Project Description:	PVC Fabricator	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	GLYCOL TANKS		
2. EU ID Number:	01		
3. EU Type:	<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source – Previous Permit #:		Date Issued:
4. Manufacturer:			
5. Model:			
6. Maximum Capacity:	1.85 MBTU		
7. Date of Construction:			
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Modification (if any):			
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	4160 HRS/YEAR
19. Maximum Operation	8760 HRS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)	
<input type="checkbox"/> Operation Hour Limit(s):		
<input type="checkbox"/> Production Limit(s):		
<input type="checkbox"/> Material Usage Limit(s):		
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports	
<input type="checkbox"/> Other:		
21. Rationale for Requesting the Limit(s):		



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PERMIT TO CONSTRUCT APPLICATION

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IDENTIFICATION

Company Name: Freedom Plastics, Inc	Facility Name: Preston, ID facility	Facility ID No:
Brief Project Description:	PVC Fabricator	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	SQUARE HEATERS		
2. EU ID Number:	02		
3. EU Type:	<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:		Date Issued:
4. Manufacturer:			
5. Model:			
6. Maximum Capacity:	0.12 MBTU		
7. Date of Construction:			
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Modification (if any):			
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?:	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NOx	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	4160 HRS/YEAR
19. Maximum Operation	8760 HRS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input type="checkbox"/> Material Usage Limit(s):	
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	



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IDENTIFICATION

Company Name: Freedom Plastics, Inc	Facility Name: Preston, ID facility	Facility ID No:
Brief Project Description:	PVC Fabricator	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	WALL HEATER		
2. EU ID Number:	03		
3. EU Type:	<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source – Previous Permit #:		Date Issued:
4. Manufacturer:			
5. Model:			
6. Maximum Capacity:	0.03 MBTU		
7. Date of Construction:			
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Modification (if any):			
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	4160 HRS/YEAR
19. Maximum Operation	8760 HRS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input type="checkbox"/> Material Usage Limit(s):	
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	



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Emissions Unit - General **Form EU0**

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IDENTIFICATION

Company Name: Freedom Plastics, Inc	Facility Name: Preston, ID facility	Facility ID No:
Brief Project Description:	PVC Fabricator	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	INFRARED HEATERS		
2. EU ID Number:	04		
3. EU Type:	<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source – Previous Permit #:		Date Issued:
4. Manufacturer:			
5. Model:			
6. Maximum Capacity:	1.2 MBTU		
7. Date of Construction:			
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Modification (if any):			
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?:	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	4160 HRS/YEAR
19. Maximum Operation	8760 HRS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)	
<input type="checkbox"/> Operation Hour Limit(s):		
<input type="checkbox"/> Production Limit(s):		
<input type="checkbox"/> Material Usage Limit(s):		
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports	
<input type="checkbox"/> Other:		
21. Rationale for Requesting the Limit(s):		



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IDENTIFICATION

Company Name: Freedom Plastics, Inc	Facility Name: Preston, ID facility	Facility ID No:
Brief Project Description:	PVC Fabricator	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	FORCED AIR FURNACES		
2. EU ID Number:	05		
3. EU Type:	<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:		Date Issued:
4. Manufacturer:			
5. Model:			
6. Maximum Capacity:	1.685 MBTU		
7. Date of Construction:			
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Modification (if any):			
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	4160 HRS/YEAR
19. Maximum Operation	8760 HRS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)	
<input type="checkbox"/> Operation Hour Limit(s):		
<input type="checkbox"/> Production Limit(s):		
<input type="checkbox"/> Material Usage Limit(s):		
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports	
<input type="checkbox"/> Other:		
21. Rationale for Requesting the Limit(s):		



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IDENTIFICATION

Company Name: Freedom Plastics, Inc	Facility Name: Preston, ID facility	Facility ID No:
Brief Project Description:	PVC Fabricator	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	WELD-ON P-70 PRIMER		
2. EU ID Number:	06		
3. EU Type:	<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:		Date Issued:
4. Manufacturer:	IPS CORP		
5. Model:			
6. Maximum Capacity:			
7. Date of Construction:			
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Modification (if any):			
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?:	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NOx	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	4160 HRS/YEAR
19. Maximum Operation	8760 HRS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input checked="" type="checkbox"/> Material Usage Limit(s):	2000 gal / yr
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	This source is a major contributor of total VOC emissions.



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PERMIT TO CONSTRUCT APPLICATION

Revision 2
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IDENTIFICATION

Company Name: Freedom Plastics, Inc	Facility Name: Preston, ID facility	Facility ID No:
Brief Project Description:	PVC Fabricator	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	WELD_ON 811 A-B EPOXY		
2. EU ID Number:	07		
3. EU Type:	<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:		Date Issued:
4. Manufacturer:	IPS CORP		
5. Model:			
6. Maximum Capacity:			
7. Date of Construction:			
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Modification (if any):			
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	4160 HRS/YEAR
19. Maximum Operation	8760 HRS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)	
<input type="checkbox"/> Operation Hour Limit(s):		
<input type="checkbox"/> Production Limit(s):		
<input type="checkbox"/> Material Usage Limit(s):		
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports	
<input type="checkbox"/> Other:		
21. Rationale for Requesting the Limit(s):		



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IDENTIFICATION

Company Name: Freedom Plastics, Inc	Facility Name: Preston, ID facility	Facility ID No:
Brief Project Description:	PVC Fabricator	

EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	AA-2304 Contact Cement		
2. EU ID Number:	08		
3. EU Type:	<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:		Date Issued:
4. Manufacturer:	ARROW ADHESIVES CO		
5. Model:			
6. Maximum Capacity:			
7. Date of Construction:			
8. Date of Modification (if any)			
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.		

EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:						
11. Date of Installation:			12. Date of Modification (if any):			
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)					
	Pollutant Controlled					
	PM	PM10	SO ₂	NOx	VOC	CO
Control Efficiency						

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	4160 HRS/YEAR
19. Maximum Operation	8760 HRS/YEAR

REQUESTED LIMITS

20. Are you requesting any permit limits?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)
<input type="checkbox"/> Operation Hour Limit(s):	
<input type="checkbox"/> Production Limit(s):	
<input type="checkbox"/> Material Usage Limit(s):	
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	



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PERMIT TO CONSTRUCT APPLICATION

Revision 2
02/14/07

Please see instructions on page 2 before filling out the form.

IDENTIFICATION						
Company Name: Freedom Plastics, Inc		Facility Name: Preston, ID facility			Facility ID No:	
Brief Project Description:		PVC Fabricator				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
1. Emissions Unit (EU) Name:		1969 GREEN GLUE				
2. EU ID Number:		09				
3. EU Type:		<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:				Date Issued:
4. Manufacturer:		IPS CORP				
5. Model:						
6. Maximum Capacity:						
7. Date of Construction:						
8. Date of Modification (if any)						
9. Is this a Controlled Emission Unit?		<input type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.				
EMISSIONS CONTROL EQUIPMENT						
10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.						
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)						
18. Actual Operation		4160 HRS/YEAR				
19. Maximum Operation		8760 HRS/YEAR				
REQUESTED LIMITS						
20. Are you requesting any permit limits?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):						
<input type="checkbox"/> Production Limit(s):						
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> Other:						
21. Rationale for Requesting the Limit(s):						



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IDENTIFICATION						
Company Name: Freedom Plastics, Inc		Facility Name: Preston, ID facility			Facility ID No:	
Brief Project Description:		PVC Fabricator				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
1. Emissions Unit (EU) Name:		WELD-ON 711 WHITE GLUE				
2. EU ID Number:		10				
3. EU Type:		<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: Date Issued:				
4. Manufacturer:		IPS CORP				
5. Model:						
6. Maximum Capacity:						
7. Date of Construction:						
8. Date of Modification (if any)						
9. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.				
EMISSIONS CONTROL EQUIPMENT						
10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NOx	VOC	CO
17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.						
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)						
18. Actual Operation		4160 HRS/YEAR				
19. Maximum Operation		8760 HRS/YEAR				
REQUESTED LIMITS						
20. Are you requesting any permit limits?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):						
<input type="checkbox"/> Production Limit(s):						
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> Other:						
21. Rationale for Requesting the Limit(s):						



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IDENTIFICATION						
Company Name: Freedom Plastics, Inc		Facility Name: Preston, ID facility			Facility ID No:	
Brief Project Description:		PVC Fabricator				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
1. Emissions Unit (EU) Name:		WELD-ON 711 GREY GLUE				
2. EU ID Number:		11				
3. EU Type:		<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: Date Issued:				
4. Manufacturer:		IPS Corp				
5. Model:						
6. Maximum Capacity:						
7. Date of Construction:						
8. Date of Modification (if any):						
9. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.				
EMISSIONS CONTROL EQUIPMENT						
10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.						
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)						
18. Actual Operation		4160 HRS/YEAR				
19. Maximum Operation		8760 HRS/YEAR				
REQUESTED LIMITS						
20. Are you requesting any permit limits?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):						
<input type="checkbox"/> Production Limit(s):						
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> Other:						
21. Rationale for Requesting the Limit(s):						



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IDENTIFICATION						
Company Name: Freedom Plastics, Inc		Facility Name: Preston, ID facility			Facility ID No:	
Brief Project Description:		PVC Fabricator				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
1. Emissions Unit (EU) Name:		WELD-ON 719 WHITE GLUE				
2. EU ID Number:		12				
3. EU Type:		<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: Date Issued:				
4. Manufacturer:		IPS Corp				
5. Model:						
6. Maximum Capacity:						
7. Date of Construction:						
8. Date of Modification (if any)						
9. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.				
EMISSIONS CONTROL EQUIPMENT						
10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.						
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)						
18. Actual Operation		4160 HRS/YEAR				
19. Maximum Operation		8760 HRS/YEAR				
REQUESTED LIMITS						
20. Are you requesting any permit limits?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):						
<input type="checkbox"/> Production Limit(s):						
<input checked="" type="checkbox"/> Material Usage Limit(s):		1500 GAL / YR				
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> Other:						
21. Rationale for Requesting the Limit(s):		This source is a major contributor to total VOC emissions.				



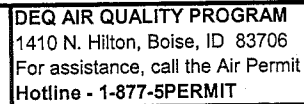
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PERMIT TO CONSTRUCT APPLICATION

Revision 2
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IDENTIFICATION						
Company Name: Freedom Plastics, Inc		Facility Name: Preston, ID facility			Facility ID No:	
Brief Project Description:		PVC Fabricator				
EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION						
1. Emissions Unit (EU) Name:		719 GREY GLUE				
2. EU ID Number:		13				
3. EU Type:		<input type="checkbox"/> New Source <input checked="" type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #: Date Issued:				
4. Manufacturer:		IPS CORP				
5. Model:						
6. Maximum Capacity:						
7. Date of Construction:						
8. Date of Modification (if any)						
9. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If Yes, Complete the following section. If No, go to line 18.				
EMISSIONS CONTROL EQUIPMENT						
10. Control Equipment Name and ID:						
11. Date of Installation:		12. Date of Modification (if any):				
13. Manufacturer and Model Number:						
14. ID(s) of Emission Unit Controlled:						
15. Is operating schedule different than emission units(s) involved?:		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.						
EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)						
18. Actual Operation		4160 HRS/YEAR				
19. Maximum Operation		8760 HRS/YEAR				
REQUESTED LIMITS						
20. Are you requesting any permit limits?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):						
<input type="checkbox"/> Production Limit(s):						
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> Other:						
21. Rationale for Requesting the Limit(s):						



PERMIT TO CONSTRUCT APPLICATION

Preston, Idaho

Facility ID No.:

Brief Project Description:	PVC Fabricator
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Please see instructions on next page before filling out the form.

3.

1.	2.	PM ₁₀		SO ₂		NO _x		CO		VOC		Lead	
Emissions units	Stack ID	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Point Source(s)													
Glycol Tanks	Glycol	0.01	0.06	0.00	0.00	0.18	0.79	0.15	0.67	0.01	0.04		
Square Heaters	Square	0.00	0.00	0.00	0.00	0.01	0.05	0.01	0.04	0.00	0.00		
Wall Heater	Wall	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00		
Infrared Heater	Infrared	0.01	0.04	0.00	0.00	0.12	0.52	0.10	0.43	0.01	0.03		
Forced Air Furnaces	Forced	0.01	0.05	0.00	0.00	0.17	0.72	0.14	0.61	0.01	0.04		
Total		0.03	0.15	0.00	0.01	0.49	2.09	0.40	1.76	0.03	0.11		

[illegible]



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IDENTIFICATION		
Company Name: Freedom Plastics, Inc.	Facility Name: Freedom Plastics, Preston, ID facility	Facility ID No:
Brief Project Description: PVC Fabricator		
APPLICABILITY DETERMINATION		
1. Will this project be subject to 1990 CAA Section 112(g)? (Case-by-Case MACT)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	* If YES then applicant must submit an application for a case-by-case MACT determination [IAC 567 22-1(3)"b" (8)]
2. Will this project be subject to a New Source Performance Standard? (40 CFR part 60)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	*If YES please identify sub-part: _____
3. Will this project be subject to a MACT (<u>M</u> aximum <u>A</u> chievable <u>C</u> ontrol <u>T</u> echnology) regulation? (40 CFR part 63)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	*If YES please identify sub-part: _____
THIS ONLY APPLIES IF THE PROJECT EMITS A HAZARDOUS AIR POLLUTANT		
4. Will this project be subject to a NESHAP (<u>N</u> ational <u>E</u> mission <u>S</u> tandards for <u>H</u> azardous <u>A</u> ir <u>P</u> ollutants) regulation? (40 CFR part 61)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	*If YES please identify sub-part: _____
5. Will this project be subject to PSD (<u>P</u> revention of <u>S</u> ignificant <u>D</u> eterioration)? (40 CFR section 52.21)	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES	
6. Was netting done for this project to avoid PSD?	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES*	*If YES please attach netting calculations
IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS, CALL THE AIR PERMIT HOTLINE AT 1-877-5PERMIT		

Appendix B

Actual Emission Estimates
